## McCampbell & Young

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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

February 18, 1993

r. I. ED

FER 23 1993

FCC MAIL ROOM

The Honorable Donna R. Searcy, Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

Re:

PORERT S. YOUNG, IR.

LINDSAY YOUNG ROBERT S. MAROUIS

ROBERT S. STONE

MARK K. WILLIAMS JANIE C. PORTER

R SCOTT FIMORE

TAMMY KAOUSIAS BENÉT S. THEISS

J. CHRISTOPHER KIRK

GREGORY E. ERICKSON

MM Docket No. 92-307

Panama City Beach, Florida

Dear Ms. Searcy:

Enclosed please find an original and six copies of a Motion to Reschedule Pre-hearing Conference submitted herewith on behalf of our client in the above-referenced matter, Sunkissed Broadcasting, Inc. Also enclosed is an additional copy of the Motion to be returned to us in the enclosed postage paid, self-addressed envelope after it has been date stamped by your office.

Should you or any members of your staff have questions concerning the enclosed, please contact the undersigned for clarification. Thank you for your cooperation in this matter.

Very truly yours,

MCCAMPBELL & YOUNG, P.C.

· \_\_\_\_\_

RSS/dlb Enclosures

cc:

Sunkissed Broadcasting, Inc.

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## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of	MM Docket No. 92-307
SUNKISSED BROADCASTING, INC.	File No. BPCT-910617KE
BEACH TV PROPERTIES, INC.	File No. BPCT-910825KE
For Construction Permit for ) A New Commercial Television )	RECEIVED
Station on Channel 46 in ) Panama City Beach, Florida )	FEB 2 4 1993
TO: Honorable Joseph P. Gonzalez	FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Administrative Law Judge

Sunkissed Broadcasting, Inc. ("SBI"), by counsel, hereby respectfully requests that the pre-hearing conference in the above matter, now scheduled for 9:00 a.m. on March 12, 1993 in the offices of the Commission, be rescheduled for 1:00 p.m. on the same date, March 12, 1993. In support whereof, the following is shown:

MOTION TO RESCHEDULE PRE-HEARING CONFERENCE

- 1. Counsel for SBI is located in Knoxville, Tennessee, which will require counsel to travel to Washington, D.C. in order to attend the pre-hearing conference in person as ordered by the Presiding Officer. *See Order*, FCC 93M-64, released February 9, 1993.
- 2. The earliest arrival by air on any flight from Knoxville to Washington National Airport is 9:39 a.m., following a connection in Charlotte via U.S. Air. Given the normal delays in departures, connections, and arrivals to be expected from such an itinerary, it is reasonable to assume that counsel for SBI would be unable to appear at the conference until sometime later that morning. Counsel for SBI has therefore chosen 1:00 p.m. as a time for this request in an

effort to assure his ability to timely arrive at the conference. Unless the pre-hearing conference is rescheduled, the undersigned counsel for SBI would be required to travel to Washington on March 11, 1993 and secure lodging at a Washington hotel for the night in order to attend the pre-hearing conference, an expense which could be avoided by rescheduling the time of the conference as requested herein.

3. Counsel for competing applicant Beach TV Properties, Inc. and the Mass Media Bureau's Hearing Branch have been contacted and have authorized the undersigned to state that they would consent to a grant of the instant request. The undersigned has also informally contacted the office of the Presiding Officer in an effort to confirm that hearing room space would be available at the 1:00 hour.

WHEREFORE, premises considered, Sunkissed Broadcasting, Inc. respectfully moves for an Order by the Presiding Officer rescheduling the above-referenced pre-hearing conference from 9:00 a.m. to 1:00 p.m. on March 12, 1993.

Dated this 18th day of February, 1993.

Respectfully Submitted,

SUNKISSED BROADCASTING, INC.

McCampbell & Young, P.C. Attorney for Sunkissed Broadcasting, Inc.

By: Robert Story

McCampbell & Young A Professional Corporation 2021 Plaza Tower Post Office Box 550 Knoxville, Tennessee 37901-0550 (615) 637-1440

February 18, 1993

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Motion to Reschedule Pre-hearing Conference has been served, this 18th day of February, 1993, upon all counsel or parties as listed below at interest in this cause by delivering a true and exact copy to the offices of said counsel or parties or by placing a copy in the United States mail addressed to said counsel or parties at his/her office, with sufficient postage to carry it to its destination, or by special overnight courier.

Henry A. Solomon, Esq. Haley, Bader & Potts Suite 900 1450 North Fairfax Drive Arlington, VA 22203-1633 Counsel to Beach TV Properties, Inc.

Honorable Joseph P. Gonzalez Administrative Law Judge Federal Communications Commission 2000 L Street N.W., Room 221 Washington, D.C. 20554

James Shook, Esq.
Hearing Branch
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7212
Washington, D.C. 20554

Robert St Stone